

EXHIBIT 3

COMPARISON CHART
PLAINTIFFS' AND DEFENDANTS' PROPOSED DATES

Event	Plaintiffs' Proposal	Defendants' Proposal
<u>Preliminaries and Disclosures</u>		
Scheduling Conference	February 16, 2024	
Discovery requests may be served	February 16, 2024	
Initial Disclosures	February 26, 2024	
Plaintiffs requests that Defendants produce all docs and correspondence as of Feb. 29, 2024 produced to DOJ, FTC, Congress, any State AG, and/or any other state or federal regulatory agency, or any document disco, white papers, narratives, or any other disco provided to regulators re RMS	March 15, 2024	Defendants do not agree
Attachment 1 Disclosures	April 1, 2024	Defendants do not agree
Deadline to begin meet and confer about custodians	March 11, 2024	
<u>Mediation</u>		
Mediation	March 15, 2024 April 8, 2024	
<u>Document and Data Production</u>		
Parties begin rolling productions of documents from non-custodial sources	April 26, 2024 or within 60 days of receipt of the request, whichever is later	
Parties begin rolling productions of documents from custodial sources	No later than 60 days of finalization of all custodians; provided, however, that if the Parties have a dispute over any specific custodian, the 60 day deadline for that custodian will start upon resolution of any impasse	
Defendants produce Sample Structured Data *subject to receipt of and meet and confer regarding data request	May 1, 2024	
Plaintiffs raise questions about sample structured data production	June 5, 2024	
Defendants to respond to questions about sample structured data	July 10, 2024	
Defendants complete production of structured data	October 25, 2024	

Event	Plaintiffs' Proposal	Defendants' Proposal
Completion of Document Productions ¹	March 28, 2025	
<u>Last Day to Serve RFAs²</u>	August 21, 2025	
<u>Fact Discovery Cut-Off</u>	November 21, 2025	
<u>Expert Discovery and Class Certification (*Reports must comply with Rule 26 (a)(2)(B)(i)).</u>		
All Parties must serve all expert reports on issues on which they have the burden of proof (including class and merits issues) ("Opening Reports")	February 19, 2026	
All Parties must serve opposition expert reports ("Rebuttal Reports")	April 20, 2026	
All Parties must serve reply expert reports ("Reply Reports")	June 4, 2026	
Plaintiffs' Class Certification Motion	July 20, 2026	August 15, 2025 (plus class certification expert reports)
Defendants' Opposition	September 7, 2026	November 21, 2025 (plus class certification expert reports)
Plaintiffs' Reply Brief	October 7, 2026	January 16, 2026 (plus class certification expert reports)
<u>Daubert Motions for Experts</u>		
<i>Daubert</i> Motions	July 20, 2026 (class and merits Opening Reports) September 7, 2026 (class and merits Rebuttal Reports)	November 21, 2025 (Plaintiffs' class report) January 16, 2026 (Defendants' class report)

¹ Plaintiffs have proposed that this deadline is for full and complete production of documents. Defendants have proposed that this is a deadline for substantial completion of document production.

² This deadline excludes RFAs not related to authenticity and admissibility.

Event	Plaintiffs' Proposal	Defendants' Proposal
<i>Daubert</i> Oppositions	September 7, 2026 (class and merits Opening reports) October 7, 2026 (class and merits Rebuttal Reports)	January 16, 2026 (Plaintiffs' class report) February 20, 2026 (Defendants' class report)
<i>Daubert</i> Replies	October 7, 2026 (class and merits) November 6, 2026 (class and merits Rebuttal Reports)	February 20, 2026 (Plaintiffs' class report) March 23, 2026 (Defendants' class report)
<u>Hearings on Class Certification and Daubert</u>		
Hearing(s) on Class Certification motion and <i>Daubert</i> motions	November 2026 (includes <i>Daubert</i> on class and merits expert reports)	April 2026 (on class certification and <i>Daubert</i> class reports only)
<u>Defendants' Proposal for Merits Expert Reports and Deposition (Reports must comply with Rule 26 (a)(2)(B)(i))</u>		
Plaintiffs' Reports Due		June 19, 2026
Defendants' Reports Due		August 14, 2026
Reply Reports Due		September 18, 2026
<i>Daubert</i> Motions Due		October 23, 2026
<i>Daubert</i> Oppositions Due		December 18, 2026
<i>Daubert</i> Replies Due		January 22, 2027
<i>Daubert</i> Oral Arguments		TBD by Court
<u>Motions for Summary Judgment</u>		
Parties file any Motions for Summary Judgment	March 1, 2027	April 16, 2027
Parties file Responses to MSJs	April 30, 2027	May 28, 2027
Parties file Replies to MSJ Responses	June 14, 2027	June 25, 2027
MSJ Oral Arguments	July 2027	TBD by court

Event	Plaintiffs' Proposal	Defendants' Proposal
<u>Second Mediation</u>		
Last Day to Mediate	August 13, 2027	
<u>TRIAL</u>		
Trial of Tennessee actions and remand for others	October 1, 2027 or shortly thereafter	75-100 days after ruling on MSJ